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STATE OF ILLINOIS
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CENTRAL ILLINOIS PUBLIC SERVICE	)	
COMPANY (AmerenCIPS) and	)	CHIEF CLERK'S OFFICE
WAYNE-WHITE COUNTIES ELECTRIC	)	
COOPERATIVE,	)	
	)	Docket No.: 03-0079
JOINT PETITION FOR APPROVAL OF AN	)	
AGREEMENT AMENDING THE SERVICE	)	
AREA AGREEMENT BETWEEN THE	)	
PARTIES AND DEFINING SERVICE	)	
AREAS IN EDWARDS COUNTY AND	)	
WAYNE COUNTY, ILLINOIS PURSUANT	)	
TO SECTION 6 OF THE ILLINOIS	)	
ELECTRIC SUPPLIER ACT.	)	

#### SUPPLEMENT TO JOINT PETITION

NOW COME the Petitioners CENTRAL ILLINOIS PUBLIC SERVICE COMPANY, d/b/a AmerenCIPS ("CIPS") and WAYNE-WHITE COUNTIES ELECTRIC COOPERATIVE ("WWCEC"), by their respective counsel and pursuant to Section 6 of the Electric Supplier Act supplement the Joint Petition herein with the following information:

- 1. The parties do not believe that one of the affected customers, Mr. Leroy Spier, Spier Operating, received notice of the parties' request for approval to transfer Spier Operating as a customer from CIPS to WWCEC prior to his receipt of the official notice sent by the Commission on February 24, 2003.
- 2. The parties' Verified Joint Petition and proposed "Modification of Service Area Agreement" establish that the oil-producing leases referred to as the "Works Unit", lies entirely within WWCEC's designated service area, but has received electric service from CIPS over WWCEC's distribution facilities for a number of years.
  - 3. The "split" service arrangement for the Works Unit arose out of a settlement

agreement between CIPS, WWCEC, Soyland Power Cooperative, and Southwestern Illinois Electric Cooperative dated May 22, 1995, (the "Global Settlement"), In I.C.C. Docket No. 92-0463, the Commission granted CIPS the right to serve the Works Unit in WWCEC's service territory based upon CIPS's claim of a valid contractual "grandfather" right under Par. 1 of the CIPS-WWCEC Service Area Agreement. CIPS's Complaint in 92-0463 had arisen out of the oil field operator's decision to terminate a CIPS feed and substitute a WWCEC feed. The Global Settlement allowed CIPS to continue as the supplier for the Works Unit (then operated by Spier's predecessor, Equinox Oil Company, but accommodated the customer's desire to reconfigure its own distribution system.

4. The portion of the parties' proposed modification pertaining to the Bi-Petro/Golden Gate oil field has been negotiated by the parties in a good-faith effort to accommodate the request of the customer, Bi-Petro, Inc.

WHEREFORE, Petitioners pray that the Illinois Commerce Commission approve the pending Joint Petition.

CENTRAL ILLINOIS PUBLIC SERVICE d/b/a AmerenCIPS

By: BROWN, HAY & STEPHENS

By: One of Its Attorneys

SCOTT C. HELMHOLZ Brown, Hay & Stephens 205 S. Fifth Street, Suite 700 P.O. Box 2459 Springfield, IL 62705 TelephoneL (217) 544-8491 WAYNE-WHITE COUNTIES COMPANY, ELECTRIC COOPERATIVE

One of Its Attorneys

FYIE & HAWKINS

JAY FYIE

By:

Fyie & Hawkins

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Telephone: (618)842-2666

### **VERIFICATION**

STATE OF ILLINOIS )	
)ss	
COUNTY OF WAYNE)	
Derick Colgan	_, being first duly sworn upon his oath, deposes and states
that he is the President/CEO	to the Wayne-White Counties Electric
SUPPLEMENT TO JOINT PETITION	use of action, that he has read the above and foregoing him subscribed and that the same is true in substance and in stated to be on information and belief and as to those matters
he believes them to be true.	
	By: Duik Colge
	DERICK COLGAN (Printed)
	(1 mileu)
	Its PRESIDENT (CEO (Title)
Subscribed and sworn to before	me this Mark, 2003.
	Notary Public
	/ Mounty I done
	OFFICIAL SEAL JAY H. FYIE NOTARY PUBLIC STATE OF ILLINOIS My Commission Expires 12-06-2003

#### VERIFICATION

## STATE OF ILLINOIS ) ss COUNTY OF SANGAMON)

JON R. CARLS, being first duly sworn upon his oath, deposes and states that he is the Director of the Regulatory Services Department of Ameren Services, on behalf of CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS, that he has read the foregoing Supplement to Joint Petition, that he has personal knowledge of the matters therein contained, and that the same are true, correct and complete, to the best of his knowledge, information and belief.

Dated this 25th day of March, 2003

JON R. CARL

Subscribed and sworn to before me this day of march, 2003.

OFFICIAL SEAL
NYLA A. BARTELS
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 1-27-2007

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